

EXHIBIT G

KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

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Michael Kind <mkind@kazlg.com>

RE: Gonzalez & Barba v. Allied Collection Services, Inc. - 2:16-cv-02909 - Meet and Confer

1 message

Vernon Nelson <vnelson@nelsonlawfirmllv.com>

Sat, May 26, 2018 at 11:39 AM

To: Michael Kind <mkind@kazlg.com>

Cc: Danielle Alvarado <DanielleA@nelsonlawfirmllv.com>

Michael- following up on our meet and confer...

1. With respect to Request for Production # 2 (and other discovery response related thereto)- I told you there are no docs provided to Allied by Mendoza (or Fisher or McIntyre) at the time the account is assigned for collection. The accounts are electronically imported and documents are only provided upon request of Allied to the client. I verified there is no report that can be run. Allied can provide a screen shot of the Debt Master Debt ID window which has the list date and shows the principal balance as listed. I understand Mendoza has an original principal (imported) balance of \$1480.00. Fisher has an original principal (imported) balance of \$1,990.00 McIntyre has an original principal (imported) balance of \$421.67. Allied is the process of taking the screen shots and sending them to me. I will forward to you as soon as I receive them.
2. Request for production #5 and #6. I incorrectly told you the IMMI agreement that Mendoza produced covered all the Doctors. I just learned there is a separate contract for Fischer and McIntyre...however, I understand it is the same form agreement that was used for Mendoza.
3. The running balance documents do not exist because Allied has no business purpose for maintain such records. For example, Allied has no business reason today ...to need to know the balance of Jamie Retguin's account on February 17, 2016. The balance on that date, particularly the amount of interest due on that day, would have to be manually calculated on that day. Allied has produced all the information necessary for Plaintiff to be able to calculate these amounts on their own.
4. We discussed Interrogatories #1 and #2. We discussed that you want to know whether Allied obtained either of the Plaintiff's credit reports. We differentiated "obtaining a report" from accessing the report for credit reporting purposes. The Debtor history report attached to Allied's First Supplement to Initial Disclosures Bates No. 129-146 refer to certain times when Allied reported information to the credit reporting agencies about Ms. Gonzalez. Allied never reported any information to CRAs about Mr. Barba.

Allied has no records indicating if obtained a credit report for either of the plaintiffs.

Let me know if you have any other questions.

Thanks

Vernon

From: Michael Kind <mkind@kazlg.com>
Sent: Thursday, May 17, 2018 8:19 PM
To: Danielle Alvarado <DanielleA@nelsonlawfirm.lv.com>
Cc: Hyde & Swigart APC (sara@westcoastlitigation.com) <sara@westcoastlitigation.com>; dkrieger@hainesandkrieger.com; Vernon Nelson <vnelson@nelsonlawfirm.lv.com>; Alicia B. Tomolo (abtomolo@gmail.com) <abtomolo@gmail.com>
Subject: Re: Gonzalez & Barba v. Allied Collection Services, Inc. - 2:16-cv-02909 - Meet and Confer

Mr. Nelson,

Please see the attached meet and confer letter. Given the short time before discovery closes, please respond by email or call me directly: 702 405 1765.

Thank you,

Michael Kind, Esq.

KAZEROUNI
LAW GROUP, APC

6069 South Fort Apache Road, Suite 100

Las Vegas, Nevada 89148

Direct: (702) 405-1765

Toll free: (800) 400-6808, ext. 7

Fax: (800) 520-5523

www.kazlg.com

www.vegasdebtdefense.com

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